

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:05-cv-00329-TCK-SAJ
	)	
TYSON FOODS, INC., et al.,	)	
	)	
Defendants.	)	

**OBJECTIONS AND RESPONSES OF STATE OF OKLAHOMA TO  
SEPARATE DEFENDANT COBB-VANTRESS, INC.'S FIRST SET OF  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
PROPOUNDED TO PLAINTIFFS**

The Plaintiff State of Oklahoma respectfully submits its objections and responses to Separate Defendant Cobb-Vantress, Inc.'s First Set of Interrogatories and Requests for Production of Documents Propounded to Plaintiffs. The State shall supplement the following responses and attached privilege logs should additional responsive or privilege-protected documents come to its attention.

**GENERAL OBJECTIONS**

1. The State objects to producing all documents at the offices of Separate Defendant Cobb-Vantress, Inc. in Fayetteville, Arkansas, as such production is overly burdensome. As more fully set forth in the responses to each request for production, responsive documents will be produced as they are kept in the usual course of business or shall be organized and labeled to correspond with the categories in the request, or shall be produced in the exchange of documents as agreed between the parties.

2. The State objects to these discovery requests to the extent that they seek the discovery of information that is protected by the attorney-client privilege and/or the work

product doctrine.

3. The State objects to these discovery requests to the extent that they seek the discovery of information that is already in the possession of defendant, is obtainable from another source that is more convenient, less burdensome or less expensive, or is as accessible to defendant as it is to the State. As such, the burden of obtaining such sought-after information is substantially the same, or less, for defendant as it is for the State.

4. The State objects to these discovery requests to the extent that they are overly broad, oppressive, unduly burdensome and expensive to answer. Providing answers to such discovery requests would needlessly and improperly burden the State.

5. The State objects to these discovery requests to the extent that they improperly seeks identification of “all” items or “each” item of responsive information. Such discovery requests are thus overly broad and unduly burdensome. It may be impossible to locate “all” items or “each” item of responsive information to such discovery requests.

6. The State objects to the extent that discovery sought is unreasonably cumulative or duplicative.

7. The State objects to these discovery requests to the extent that they do not state with the required degree of specificity and particularity what information is being sought. As such, such discovery requests are vague, indefinite, ambiguous and not susceptible to easily discernible meaning.

8. The state objects to these discovery requests to the extent that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties resources, and the importance of the proposed discovery in resolving the issues.

9. The State objects to these discovery requests to the extent that they improperly attempt to impose obligations on the State other than those imposed or authorized by the Federal Rules of Civil Procedure.

10. The State objects to the definitions of these discovery requests to the extent that they improperly attempt to alter the plain meaning of certain words.

**OBJECTIONS AND RESPONSES TO INTERROGATORIES**

**INTERROGATORY NO. 1:** For each instance since January 1,2003 that the STATE PLAINTIFFS, or anyone acting under their direction performed any monitoring, sampling or testing of any (i) animal excrement or bedding including but not limited to poultry litter, (ii) sediments or soils, (iii) air, (iv) groundwater or surface water (whether in creeks, streams, rivers, lakes, reservoirs or elsewhere) in the Illinois River watershed for the presence of any constituent, including but not limited to those constituents identified in your complaint in this action, please state:

- a) the date (mm/dd/yy) and specific location (by GPS coordinates where available) for each such sampling, monitoring or testing event;
- b) the name, address and telephone number of each PERSON or entity involved in the each such sampling, monitoring or testing event and describe the nature of each such PERSON'S relationship with the STATE PLAINTIFFS;
- c) Indicate the type of media or material being sampled, monitored or tested during each such sampling, monitoring or testing event (i.e., poultry litter, sediments, soils, air, groundwater or surface water); and
- d) Describe all tests or laboratory analysis performed or conducted on the media or material being sampled, monitored or tested during each such sampling, monitoring or testing event and

indicate or provide the results of all such tests or laboratory analysis.

**OBJECTION AND RESPONSE TO INTERROGATORY NO. 1:** The State objects to this interrogatory on the ground that it seeks information protected by the attorney-client privilege and/or work product protection.

The State objects to this interrogatory to the extent that it seeks information known or opinions held by expert consultants retained or specially employed by the State or by its counsel in anticipation of litigation or preparation for trial. Fed. R. Civ. P. 26(b)(4)(A) and (B). As of the date of this response, the State has not determined which expert retained by it or by its counsel will provide expert testimony in this case, and the Court has neither established the times and sequence of disclosure of such expert witnesses pursuant to Fed. R. Civ. P. 26(a)(2)(C), nor has the Court established a trial date to trigger the obligation of expert disclosure 90 days in advance of trial under that rule. The State will comply with the order of the Court establishing the time of expert disclosures as required by Fed. R. Civ. P. 26.

The State also objects pursuant to Fed. R. Civ. P. 26(b)(3) to any discovery of documents or tangible things prepared in anticipation of litigation or for trial by it or by consultants retained by it or by its counsel.

Pursuant to Fed. R. Civ. P. 26(b)(5) and LCvR 26.4, the State's claim of attorney-client privilege and work product protection is supported by the attached privilege log. Also, pursuant to LCvR 26.4(b), the attached privilege log does not contain any work product protection material or attorney-client privileged material created after the commencement of this action on June 13, 2005. The State reserves its work product protection claim and attorney-client privilege claim for all such materials, and reserves its right to supplement the attached privilege log should the Court enter any order requiring a log for protected or privileged materials created after the

commencement of this action.

Pursuant to Fed. R. Civ. P. 33(d), information sought in this Interrogatory, and whose production is not objected to herein, may be found in the business records of the State which shall be provided to Defendant Cobb-Vantress, Inc. in the State's initial document disclosures as agreed by the parties on May 26, 2006 (or any such later date as may be mutually agreed upon by the parties). At that time, the State shall produce to Defendant Cobb-Vantress, Inc. an index of the responsive documents within the document production scheduled for that date.

### **OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO.1:** Provide copies of any and all DOCUMENTS RELATING to each and every sampling, monitoring or testing event referenced in Interrogatory No.1 above including, but not limited to, sampling plans, laboratory results, assay reports, QA/QC documents, sampling protocols, photographs and site sketches.

**OBJECTION AND RESPONSE TO REQUEST FOR PRODUCTION NO.1:** The State objects to this request for production on the ground that it seeks materials protected by the attorney-client privilege and/or work product protection.

The State objects to this request for production of documents to the extent that it seeks information known or opinions held by expert consultants retained or specially employed by the State or by its counsel in anticipation of litigation or preparation for trial. Fed. R. Civ. P. 26(b)(4)(A) and (B). As of the date of this response, the State has not determined which expert consultants retained by it or by its counsel will provide expert testimony in this case, and the Court has neither established the times and sequence of disclosure of such expert witnesses pursuant to Fed. R. Civ. P. 26(a)(2)(C), nor has the Court established a trial date to trigger the obligation of expert disclosure 90 days in advance of trial under that rule. The State will comply

with the order of the Court establishing the time of expert disclosures as required by Fed. R. Civ. P. 26

The State objects pursuant to Fed. R. Civ. P. 26(b)(3) to any discovery of documents or tangible things prepared in anticipation of litigation or for trial by it or by consultants retained by it or by its counsel.

Pursuant to Fed. R. Civ. P. 26(b)(5) and L.CvR 26.4, the State's claim of attorney-client privilege and work product protection is supported by the attached privilege log. Also, pursuant to LCvR 26.4(b), the attached privilege log does not contain any work product protected material or attorney-client privileged material created after the commencement of this action on June 13, 2005. The State reserves its attorney-client privilege claim and work product protection claim for such materials, and reserves its right to supplement the attached privilege log should the Court enter any order requiring a log for privileged or protected materials created after the commencement of this action.

The State further objects that the request seeking "any and all DOCUMENTS RELATING to each and every" sampling event, etc., because such request is overly broad, unduly burdensome and the burden and expense of the discovery outweighs its likely benefit taking into account the needs of the case and the importance of the proposed discovery in resolving the issues.

The State shall produce responsive documents reasonably available and not subject to the foregoing objection in the business records of the State which shall be provided Defendant Cobb-Vantress, Inc. with the State's initial document disclosures as agreed by the parties on May 26, 2006 (or any such later date as may be mutually agreed upon by the parties). At that time, the State shall produce to Defendant Cobb-Vantress, Inc. an index of the responsive documents

within the document production scheduled for that date.

**REQUEST FOR PRODUCTION NO.2:** Provide copies of any and all documents relating to the "scientific investigations" of groundwater contamination in the Illinois River Watershed as referenced in paragraph 4 of Plaintiffs' Motion for Leave to Conduct Limited Expedited Discovery and Brief In Support (Dkt No 210) including, but not limited to, sampling plans, laboratory results, assay reports, QA/QC documents, sampling protocols, photographs and site sketches.

**OBJECTION AND RESPONSE TO REQUEST FOR PRODUCTION NO. 2:** The State objects to this request for production on the ground that it seeks materials protected by the attorney-client privilege and/or work product protection.

The State objects to this request for production of documents to the extent that it seeks information known or opinions held by expert consultants retained or specially employed by the State or by its counsel in anticipation of litigation or preparation for trial. Fed. R. Civ. P. 26(b)(4)(A) and (B). As of the date of this response, the State has not determined which expert retained by it or by its counsel will provide expert testimony in this case, and the Court has neither established the times and sequence of disclosure of such expert witnesses pursuant to Fed. R. Civ. P. 26(a)(2)(C), nor has the Court established a trial date to trigger the obligation of expert disclosure 90 days in advance of trial under that rule. The State will comply with the order of the Court establishing the time of expert disclosures as required by Fed. R. Civ. P. 26.

The State objects pursuant to Fed. R. Civ. P. 26(b)(3) to any discovery of documents or tangible things prepared in anticipation of litigation or for trial by it or by consultants retained by it or by its counsel.

Pursuant to Fed. R. Civ. P. 26(b)(5) and LCvR 26.4, the State's claim of attorney-client



privilege and work product protection is supported by the attached privilege log. Also, pursuant to LCvR 26.4(b), the attached privilege log does not contain any attorney-client privileged material or work product protected material created after the commencement of this action on June 13, 2005. The State reserves its attorney-client privilege and work product privilege claim for such materials, and reserves its right to supplement the attached privilege log should the Court enter any order requiring a log for privileged or protected materials created after the commencement of this action.

The State further objects that the request seeking "any and all documents relating to the" scientific investigation, etc., because such request is overly broad, unduly burdensome and the burden and expense of the discovery outweighs its likely benefit taking into account the needs of the case and the importance of the proposed discovery in resolving the issues.

The State objects to this Request for Production because its reference to the State's earlier brief renders it vague and ambiguous. The State *believes* the Request refers to the following sentence in the referenced brief, and responds accordingly: "The State of Oklahoma's scientific investigations as well as a great deal of published scholarly research have concluded that bacteria from the Poultry Integrator Defendants' disposal practices are contaminating the groundwater in the IRW."

At present, the documents evidencing the State's "scientific investigations" of groundwater contamination are covered by the work product protection claimed in the accompanying privilege log. However, certain publicly available reports support the State's view that groundwater has been contaminated. As a courtesy to Cobb-Vantress, Inc., some of these documents shall be produced with the State's initial document disclosures as agreed by the parties on May 26, 2006 (or any such later date as may be mutually agreed upon by the parties)



and shall be identified on an index produced on that date.

**REQUEST FOR PRODUCTION NO. 3:** Provide copies of any and all DOCUMENTS RELATING to PLAINTIFFS' investigation of "Poultry Integrator Defendants' waste disposal practices" as referenced in paragraph 4 of Plaintiffs' Motion for Leave to Conduct Limited Expedited Discovery and Brief In Support (Dkt. No. 210).

**OBJECTION AND RESPONSE TO REQUEST FOR PRODUCTION NO. 3:** The State objects to this request for production on the ground that it seeks materials protected by the attorney-client privilege and/or work product protection.

The State objects to this request for production of documents to the extent that it seeks information known or opinions held by expert retained or specially employed by the State or by its counsel in anticipation of litigation or preparation for trial. Fed. R. Civ. P. 26(b)(4)(A) and (B). As of the date of this response, the State has not determined which expert retained by it or by its counsel will provide expert testimony in this case, and the Court has neither established the times and sequence of disclosure of such expert witnesses pursuant to Fed. R. Civ. P. 26(a)(2)(C), nor has the Court established a trial date to trigger the obligation of expert disclosure 90 days in advance of trial under that rule. The State will comply with the order of the Court establishing the time of expert disclosures as required by Fed. R. Civ. P. 26.

The State objects pursuant to Fed. R. Civ. P. 26(b)(3) to any discovery of documents or tangible things prepared in anticipation of litigation or for trial by it or by consultants retained by it or by its counsel.

Pursuant to Fed. R. Civ. P. 26(b)(5) and LCvR 26.4, the State's claim of attorney-client privilege and work product protection is supported by the attached privilege log. Also, pursuant to LCvR 26.4(b), the attached privilege log does not contain any attorney-client privileged

material or work product protected material created after the commencement of this action on June 13, 2005. The State reserves its attorney-client privilege claim and work product protection claim for such materials, and reserves its right to supplement the attached privilege log should the Court enter any order requiring a log for privileged or protected materials created after the commencement of this action.

The State further objects that the request seeking “any and all DOCUMENTS RELATING to PLAINTIFFS’ investigation” of Defendants waste disposal practices, etc., because such request is overly broad, unduly burdensome and the burden and expense of the discovery outweighs its likely benefit taking into account the needs of the case and the importance of the proposed discovery in resolving the issues.

The State objects to this Request for Production because its reference to the State’s earlier brief renders it vague and ambiguous. The State *believes* the Request refers to the following sentences in the referenced brief, and responds accordingly: “The State of Oklahoma’s investigation of the Poultry Integrator Defendants’ waste disposal practices has revealed that certain contaminants associated with the land disposal of poultry waste exist at levels within the environment such that they either pose a risk to human health or lead to the creation of chemicals which threaten human health. For example, poultry waste contains high levels of fecal bacteria which make their way into the waters of the IRW.”

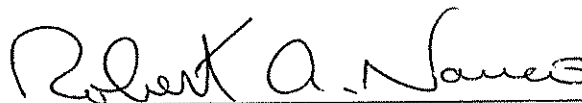
The State shall produce responsive documents reasonably available and not subject to the foregoing objection in the business records of the State which shall be provided to Defendant Cobb-Vantress, Inc. with the State’s initial document disclosures as agreed by the parties on May 26, 2006 (or any such later date as may be mutually agreed upon by the parties). At that time, the State shall produce to Defendant Cobb-Vantress, Inc. an index of the responsive documents

within the document production scheduled for that date.

Respectfully submitted,

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May 5, 2006

## VERIFICATION

[illegible]

I, Tom Gruber, being of legal age, hereby deposes and states that I have read the State's Responses and Objections to Separate Defendant Cobb-Vantress, Inc.'s First Set of Interrogatories and Requests for Production of Documents Propounded to Plaintiffs and that the same are true and correct to the best of my knowledge and belief.

Tom Cole

Tom Gruber  
First Assistant Attorney General  
State of Oklahoma

Signed and subscribed to before me on this 5<sup>th</sup> day of May, 2006.

C. Sue Thrash

Notary Public



**CERTIFICATE OF SERVICE**

I hereby certify that on May 5, 2006, I electronically transmitted the foregoing document to the following ECF registrants or via United States Mail postage prepaid to the following:

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Robert A. Nance

State of Oklahoma, et al. v. Tyson Foods, Inc., et al.  
**Privilege Log**

	Date	Author	Is Author a Lawyer?	Recipient(s)	Type of Document	General Subject Matter of the Document	Privilege Asserted FRCP
1	2005/05/23	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 1; site 04	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
2	2005/05/23	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 1; site 04	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
3	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 2; site 05	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
4	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 2; site 14	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
5	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 2; site 21	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

State of Oklahoma, et al. v. Tyson Foods, Inc., et al.  
**Privilege Log**

	Date	Author	Is Author a Lawyer?	Recipient(s)	Type of Document	General Subject Matter of the Document	Privilege Asserted FRCP
6	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 2; site 22	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
7	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 2; site 23	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
8	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 2; Site 20	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
9	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 2; Site 20	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
10	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 2; Site 21	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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12	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 2; Site 21	attorney work product; <i>Fed. R. Civ. P. 26(b)(3)&amp;(4)</i>
13	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 2; Site 22	attorney work product; <i>Fed. R. Civ. P. 26(b)(3)&amp;(4)</i>
14	2006/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 2; Site 22	attorney work product; <i>Fed. R. Civ. P. 26(b)(3)&amp;(4)</i>
15	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 2; Site 22	attorney work product; <i>Fed. R. Civ. P. 26(b)(3)&amp;(4)</i>



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17	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 2; Site 23	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
18	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 2; Site 23	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
19	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 2; Site 26	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
20	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 2; Site 26	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

*State of Oklahoma, et al. v. Tyson Foods, Inc., et al.*  
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22	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 2; Site 28	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
23	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 16	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
24	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 02	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
25	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 14	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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27	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 22	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
28	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 23	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
29	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 08	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
30	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 3; Site 20	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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32	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 20	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
33	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 3; Site 21	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
34	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 3; Site 21 (6/4/05 - 6/8/05)	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
35	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 21	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)

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37	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC, Miller Keffer Bullock Pedigo LLC, Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 22	attorney work product; <i>Fed. R. Civ. P. 26(b)(3)&amp;(4)</i>
38	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC, Miller Keffer Bullock Pedigo LLC, Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 22	attorney work product; <i>Fed. R. Civ. P. 26(b)(3)&amp;(4)</i>
39	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC, Miller Keffer Bullock Pedigo LLC, Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 3; Site 23	attorney work product; <i>Fed. R. Civ. P. 26(b)(3)&amp;(4)</i>
40	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC, Miller Keffer Bullock Pedigo LLC, Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 23	attorney work product; <i>Fed. R. Civ. P. 26(b)(3)&amp;(4)</i>

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42	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 3; Site 26	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
43	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 26	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
44	2006/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 3; Site 28	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
45	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 28	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)



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47	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 02	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
48	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 02	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
49	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 3; Site 04	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
50	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 04	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)



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52	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 3; Site 05	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
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54	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 3; Site 08	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
55	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 08	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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57	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 3; Site 14	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
58	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 14	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
59	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 14	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
60	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; Event 3; Site 16	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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62	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC, Miller Keffer Bullock Pedigo LLC, Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 16	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
63	2005/06/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC, Miller Keffer Bullock Pedigo LLC, Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Event 3; Site 16	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
64	2005/04/14	Camp Dresser & McKee, Inc.	No	Motley Rice LLC, Miller Keffer Bullock Pedigo LLC, Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 20	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
65	2005/04/14	Camp Dresser & McKee, Inc.	No	Motley Rice LLC, Miller Keffer Bullock Pedigo LLC, Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 20 (2)	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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67	2005/04/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 16 (2)	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
68	2005/04/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 5	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
69	2005/04/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 5 (2)	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
70	2005/04/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 14	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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72	2005/04/12	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 4	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
73	2005/04/12	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 4 (2)	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
74	2005/04/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 23	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
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	Date	Author	Is Author a Lawyer?	Recipient(s)	Type of Document	General Subject Matter of the Document	Privilege Asserted FRCP
76	2005/04/12	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 2	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
77	2005/04/12	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 2 (2)	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
78	2005/04/12	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 26	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
79	2005/04/12	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 26 (2)	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
80	2005/04/14	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 22	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)



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81	2005/04/14	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 22 (2)	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
82	2005/04/20	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 8	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
83	2005/04/20	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 8 (2)	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
84	2005/04/21	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 21	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
85	2005/04/21	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 21 (2)	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)



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87	2005/04/21	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; Flow Calculations; Station 28 (2)	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
88	2005/05/15	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 23	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
89	2005/05/01	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 05	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
90	2005/04/08	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; RTD Downloads; Site 23	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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91	2005/05/08	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chart	Hydrology and Highflow data; RTD Downloads; Site 05	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
92	2005/05/17	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 04	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
93	2005/05/17	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	pdf file	Hydrology and Highflow data; RTD Downloads; site 02	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
94	2005/05/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 02	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
95	2005/04/12	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 02	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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97	2005/05/17	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 04	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
98	2005/05/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 05	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
99	2005/05/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 05	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
100	2005/05/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 08	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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101	2005/04/20	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 08	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
102	2005/05/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 14	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
103	2005/06/01	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 14	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
104	2005/04/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 14	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
105	2005/05/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 14	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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106	2005/06/01	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 14	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
107	2005/05/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 20	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
108	2005/04/21	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 20	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
109	2005/05/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 21	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
110	2005/04/21	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 21	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)



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112	2005/05/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 22	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
113	2005/04/14	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 22	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
114	2005/05/20	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 22	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
115	2005/05/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 23	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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116	2005/04/13	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 23	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
117	2005/05/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 23	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
118	2005/05/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 26	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
119	2005/04/12	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 26	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
120	2005/05/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 28	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)



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121	2005/04/21	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Hydrology and Highflow data; RTD Downloads; Site 28	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
122	2005/05/14	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Edge of Field; A & L Analytical Laboratories, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
123	2005/05/14	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Edge of Field; General Engineering Laboratories, LLC form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
124	2005/05/25	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Edge of Field; Environmental Testing & Consulting, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
125	2005/05/26	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Edge of Field; Environmental Testing & Consulting, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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126	2005/06/03	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Edge of Field; Environmental Microbiology Laboratory, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
127	2005/06/03	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Edge of Field; General Engineering Laboratories, LLC form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
128	2005/06/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Edge of Field; Environmental Testing & Consulting, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
129	2005/06/08	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Edge of Field; Environmental Testing & Consulting, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
130	2005/06/08	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Edge of Field; Environmental Microbiology Laboratory, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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131	2005/06/08	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Edge of Field; General Engineering Laboratories, LLC form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
132	2005/06/10	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Edge of Field; Environmental Testing & Consulting, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
133	2005/05/25	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; High Flow; Environmental Testing & Consulting, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
134	2005/05/25	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; High Flow; Environmental Testing & Consulting, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
135	2005/05/25	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; High Flow; FoodProtech form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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137	2005/06/10	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; High Flow; Environmental Testing & Consulting, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
138	2005/06/10	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; High Flow; CDM form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
139	2005/06/10	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; High Flow; CDM form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
140	2005/05/18	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Lake Tenkiller; Event 1; Environmental Testing & Consulting, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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141	2005/05/18	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Lake Tenkiller; Event 1; Aquatec Biological Sciences form	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
142	2005/06/03	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Lake Tenkiller; Event 2; Environmental Testing & Consulting, Inc. form	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
143	2005/06/03	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Lake Tenkiller; Event 2; Aquatec Biological Sciences form	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
144	2005/03/03	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; River Sediment; A&L Analytical Laboratories, Inc. form	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
145	2005/03/03	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; River Sediment; A&L Analytical Laboratories, Inc. form	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)



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146	2005/03/17	Camp Dresser & McKee, Inc.	No	Motley Rice LLC, Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; River Sediment; Environmental Testing & Consulting, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
147	2005/03/17	Camp Dresser & McKee, Inc.	No	Motley Rice LLC, Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; River Sediment; Environmental Testing & Consulting, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
148	2005/04/19	Camp Dresser & McKee, Inc.	No	Motley Rice LLC, Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; River Sediment; Accurate Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
149	2005/04/21	Camp Dresser & McKee, Inc.	No	Motley Rice LLC, Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; River Sediment; Accurate Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
150	2005/05/25	Camp Dresser & McKee, Inc.	No	Motley Rice LLC, Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Springs; FoodProtech form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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151	2005/05/25	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Springs; General Engineering Laboratories, LLC form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
152	2005/05/26	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Springs; Environmental Testing & Consulting, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
153	2005/05/26	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Springs; FoodProtech form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
154	2005/05/26	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Springs; General Engineering Laboratories, LLC form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
155	2005/06/03	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Springs; Environmental Testing & Consulting, Inc. form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)



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	Date	Author	Is Author a Lawyer?	Recipient(s)	Type of Document	General Subject Matter of the Document	Privilege Asserted FRCP
156	2005/06/03	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Springs; FoodProtech form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
157	2005/06/03	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Chain of Custody form (pdf file)	Chains of Custody; Springs; General Engineering Laboratories, LLC form	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
158	2005/04/12	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Environmental Field Book	Environmental Field Book; Illinois River	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
159	2005/04/12	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Geological Field Book	Geological Field Book; Illinois River	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
160	2005/05/17	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Environmental Field Book	Environmental Field Book; Illinois River Project; High Flow Data	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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161	2005/05/18	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Water Quality Profile Field Sheets	Field Data; Lake Tenkiller; Event 1	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
162	2005/06/02	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Water Quality Profile Field Sheets	Field Data; Lake Tenkiller; Event 2	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
163	2005/05/17	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	A&L Lab Data (Report No. 05-139-9203)	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
164	2005/05/19	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	photo report (12 photographs)	2005 High Flow; Illinois River Photo Report	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
165	2005/05/19	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	photo report (12 photographs)	2005 High Flow; Illinois River Photo Report	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)

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166	2005/05/23	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	photographs (zip file containing 80 files)	2005 High Flow; sampling locations	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
167	2005/03/01	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	photographs (71)	2005 River Sediment; sampling locations	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
168	2005/03/01	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	photographs (20)	2005 River Sediment; sampling locations	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
169	2005/03/04	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	photographs (52)	2005 River Sediment; sampling locations	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
170	2005/04/23	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	photographs (73)	2005 River Sediment; sampling locations	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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171	2005/03/01	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	photo report (174 photographs)	2005 River Sediment; and River Sediment Sampling locations	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
172	2005/04/18	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	photo report (73 photographs)	2005 River Sediment; and River Sediment Sampling locations	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
173	2005/03/02	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	video	2005 River Sediment; sampling	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
174	2005/03/19	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	photographs (32)	2005 Small Lake Sediment; sampling	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)
175	2005/03/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	video	2005 Small Lake Sediment; sampling	attorney work product; <i>Fed. R. Civ. P.</i> 26(b)(3)&(4)

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176	2005/03/16	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	video	2005 Small Lake Sediment: sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
177	2005/05/14	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Lab Data; A&L Report Numbers 05-13-9203, 05-137-9200, 05-139-9202	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
178	2005/03/01	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	spreadsheet	Lab Data; A&L Report Numbers 05-139-0200, 05-068-9210, 05-115-9212	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
179	2005/04/06	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Report of Analysis	Lab Data: A&L Report Number 05-076-0203	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
180	2005/04/06	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Report of Analysis	Lab Data; A&L Report Number 05-077-0202	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)



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181	2005/05/11	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Report of Analysis	Lab Data; A&L Report Number 05-104-0219	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
182	2005/05/10	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Report of Analysis	Lab Data; A&L Report Number 05-110-0202	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
183	2005/05/18	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Report of Analysis	Lab Data; A&L Report Number 05-112-0206	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
184	2005/05/18	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Report of Analysis	Lab Data; A&L Report Number 05-115-0212	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
185	2005/05/31	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Report of Analysis	Lab Data; A&L Report Number 05-137-0200	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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186	2005/06/10	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Report of Analysis	Lab Data; A&L Report Number 05-139-0203	attorney work product; <i>Fed. R. Civ. P. 26(b)(3)&amp;(4)</i>
187	2005/06/03	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Report of Analysis	Lab Data; A&L Report Number 05-140-0200	attorney work product; <i>Fed. R. Civ. P. 26(b)(3)&amp;(4)</i>
188	2005/06/10	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Report of Analysis	Lab Data; A&L Report Number 05-147-0212	attorney work product; <i>Fed. R. Civ. P. 26(b)(3)&amp;(4)</i>
189	2005/05/12	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Report of Analysis	Lab Data; A&L Report Number 05-104-0219	attorney work product; <i>Fed. R. Civ. P. 26(b)(3)&amp;(4)</i>
190	2005/05/18	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Report of Analysis	Lab Data; A&L Report Number 05-112-0206	attorney work product; <i>Fed. R. Civ. P. 26(b)(3)&amp;(4)</i>



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191	2005/05/18	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Report of Analysis	Lab Data; A&L Report Number 05-115-0212	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
192	2005/03/24	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	QAQC Reports	Lab Data; A&L QAQC Reports	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
193	2005/05/25	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Analytical Report	Lab Data; Aquatec Lake Analytical Report	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
194	2005/06/06 / revised 2005/09/09	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Analytical Results (2)	Lab Data; FoodProtech; Analytical Results	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
195	2005/06/07 / revised 2005/09/12	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	Analytical Results (3)	Lab Data; FoodProtech; Analytical Results	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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196	2005/00/00	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	photographs	Photographs of sampling events; various dates	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
197	2005/03/09	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	page in notebook	Macro lab notebook	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
198	2005/04/00	Ace Aerial	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	digital photographs with included text	air photo composite of Illinois River Watershed	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
199	2005/04/00 - 2005/06/13	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	digital photographs with included text	photographs of edge of field sampling sites	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
200	2005/05/00 - 2005/06/13	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	field notes	field notes for edge of field sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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201	2005/01/00 - 2005/06/13	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	digital photographs with included text	photographs of high flow sampling sites	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
202	2005/02/00 - 2005/06/13	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	field notes	field notes for high flowsampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
203	2005/04/00 - 2005/06/13	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	digital photographs with included text	photographs of poultry facilities	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
204	2005/04/00 - 2005/06/13	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	field notes	field notes regarding poultry facilities	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
205	2005/04/00 - 2005/06/13	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	digital photographs with included text	photographs of poultry waste disposal operations	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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206	2005/04/00 - 2005/06/13	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	field notes	field notes regarding poultry waste disposal	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
207	2005/04/00 - 2005/06/13	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	video	video of poultry waste disposal operations	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
208	2005/04/00 - 2005/06/13	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	digital photographs with included text	photographs related to spring and groundwater sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
209	2005/04/00 - 2005/06/13	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	field notes	field notes related to spring and groundwater sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
210	2004/07/00	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	field notes	field notes related to Lake Tenkiller sediment sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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211	2004/07/00	Accurate Environmental Testing	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	chemical data	chemical data from Lake Tenkiller sediment sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
212	2004/07/00	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	digital photographs with included text	photographs related to Lake Tenkiller sediment sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
213	Various: 2004/07/00 - 2005/06/13	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	digital data	GIS (ArcView) files for the Illinois River Watershed and immediately surrounding areas	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
214	2004/07/00	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	digital data	analysis of agricultural census data for Arkansas and Oklahoma	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
215	2005/01/00 - 2005/02/00	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	field notes	sediment sampling locations	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)



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216	2005/01/00 - 2005/02/00	Lithochimeia, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	photographs, and digital photographs with included text	sediment sampling locations	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
217	Completed date: 2006/04/21	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	standard operating procedures	Standard Operating Procedures; Illinois River Watershed Study	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
218	undated	Camp Dresser & McKee, Inc.	No	Motley Rice LLC; Miller Keffer Bullock Pedigo LLC; Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.; Oklahoma Office of the Attorney General	sampling protocol	Illinois River Watershed Soil and Litter/Manure Sampling Protocol	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
219	2005/06/04	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
220	2005/06/03	Oklahoma Water Resources Board	No	Oklahoma Attorney General, Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling plans	attorney-client privilege
221	2005/05/23	Oklahoma Water Resources Board	No	Oklahoma Attorney General, Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling plans	attorney-client privilege
222	2005/05/18	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling plans	attorney-client privilege
223	2005/05/18	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling plans	attorney-client privilege

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224	2005/05/18	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling plans	attorney-client privilege
225	2005/05/18	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling plans	attorney-client privilege
226	2005/05/18	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling plans	attorney-client privilege
227	2005/05/18	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board, Oklahoma Attorney General	e-mail	Correspondence regarding sampling plans	attorney-client privilege
228	2005/05/17	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board, Oklahoma Attorney General	e-mail	Correspondence regarding sampling plans	attorney-client privilege
229	2005/05/18	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling plans	attorney-client privilege
230	2005/05/18	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling plans	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
231	2005/05/17	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling plans	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
232	2005/05/17	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board, Oklahoma Attorney General	e-mail	Correspondence regarding sampling plans	attorney-client privilege
233	2005/05/17	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling plans	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
234	2005/05/16	Oklahoma Attorney General	Yes	Oklahoma Water Resources Board	e-mail	Data	attorney-client privilege



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235	2005/05/10	Oklahoma Water Resources Board	No	Oklahoma Attorney General	e-mail	Correspondence regarding sampling plans	attorney-client privilege
236	2005/05/06	Camp Dresser & McKee, Inc.	No	Oklahoma Water Resources Board, Oklahoma Attorney General, Miller Keffer Bullock Pedigo LLC, Lithochimeia, Inc.	e-mail	Correspondence regarding sampling plans	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
237	2005/06/13	Camp Dresser & McKee, Inc.	No	Foodprotech, Oklahoma Water Resources Board, United States Geological Survey, Oklahoma Attorney General, Miller Keffer Bullock Pedigo LLC, Camp Dresser & McKee, Inc., Lithochimeia, Inc.	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
238	2005/04/28	Camp Dresser & McKee, Inc.	No	Foodprotech, Oklahoma Water Resources Board, United States Geological Survey, Oklahoma Attorney General, Miller Keffer Bullock Pedigo LLC, Camp Dresser & McKee, Inc., Lithochimeia, Inc.	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
239	2005/05/03	United States Geological Survey	No	Oklahoma Water Resources Board, United States Geological Survey	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
240	2005/05/02	Oklahoma Water Resources Board	No	United States Geological Survey	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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241	2005/04/22	United States Geological Survey	No	Oklahoma Water Resources Board, United States Geological Survey	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
242	2005/04/18	Camp Dresser & McKee, Inc.	No	Lithochimeia, Inc., Miller Keffer Bullock Pedigo LLC, Oklahoma Attorney General, United States Geological Survey, Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
243	2005/04/15	Camp Dresser & McKee, Inc.	No	Lithochimeia, Inc., Miller Keffer Bullock Pedigo LLC, Oklahoma Attorney General, United States Geological Survey, Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
244	2005/04/15	Oklahoma Water Resources Board	No	Camp Dresser & McKee, Inc., Lithochimeia, Inc., Miller Keffer Bullock Pedigo LLC, United States Geological Survey, Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
245	2005/05/02	Camp Dresser & McKee, Inc.	No	Oklahoma Water Resources Board, United States Geological Survey, Lithochimeia, Inc., Miller Keffer Bullock Pedigo LLC, Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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246	2005/05/02	Oklahoma Water Resources Board	No	Camp Dresser & McKee, Inc.	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
247	2005/05/02	Camp Dresser & McKee, Inc.	No	Oklahoma Water Resources Board, United States Geological Survey, Lithochimeia, Inc., Oklahoma Attorney General	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
248	2005/04/29	Oklahoma Water Resources Board	No	Foodprotech, United States Geological Survey, Camp Dresser & McKee, Inc., Lithochimeia, Inc., Miller Keffer Bullock Pedigo LLC	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
249	2005/05/02	Oklahoma Water Resources Board	No	Foodprotech, United States Geological Survey, Camp Dresser & McKee, Inc., Lithochimeia, Inc., Miller Keffer Bullock Pedigo LLC	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
250	2005/04/30	Foodprotech	No	Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
251	2005/04/18	Camp Dresser & McKee, Inc.	No	Miller Keffer Bullock Pedigo LLC, Lithochimeia, Inc., Oklahoma Attorney General, Oklahoma Water Resources Board, United States Geological Survey	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)

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252	2005/04/15	Camp Dresser & McKee, Inc.	No	Oklahoma Water Resources Board, Lithochimeia, Inc., Miller Keffer Bullock Pedigo LLC, Oklahoma Attorney General, United States Geological Survey, Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling	attorney-client privilege
253	2005/04/15	Oklahoma Water Resources Board	No	Camp Dresser & McKee, Inc., Lithochimeia, Inc., Miller Keffer Bullock Pedigo LLC, Oklahoma Attorney General, United States Geological Survey, Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
254	2005/03/29	Camp Dresser & McKee, Inc.	No	Oklahoma Water Resources Board, Lithochimeia, Inc., United States Geological Survey, Oklahoma Attorney General, Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
255	2005/03/29	Oklahoma Water Resources Board	No	Lithochimeia, Inc., Camp Dresser & McKee, Inc., United States Geological Survey, Oklahoma Attorney General, Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege

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256	2005/03/19	Camp Dresser & McKee, Inc.	No	Oklahoma Water Resources Board, Lithochimeia, Inc., Miller Keffer Bullock Pedigo LLC, Oklahoma Attorney General	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
257	2005/03/18	Oklahoma Attorney General	Yes	Oklahoma Water Resources Board, Miller Keffer Bullock Pedigo LLC, Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
258	2005/03/17	Oklahoma Water Resources Board	No	Oklahoma Attorney General, Miller Keffer Bullock Pedigo LLC, Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
259	2005/03/17	United States Geological Survey	No	Oklahoma Water Resources Board	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
260	2005/03/17	Oklahoma Water Resources Board	No	United States Geological Survey	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
261	2005/03/17	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board, Oklahoma Attorney General	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
262	2005/02/24	Camp Dresser & McKee, Inc.	No	Oklahoma Attorney General, Oklahoma Water Resources Board, Lithochimeia, Inc.	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
263	2005/02/24	Camp Dresser & McKee, Inc.	No	Oklahoma Water Resources Board, Lithochimeia, Inc.	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)



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264	2005/02/23	Camp Dresser & McKee, Inc.	No	Oklahoma Water Resources Board, Lithochimeia, Inc.	e-mail	Correspondence regarding sampling	attorney work product; Fed. R. Civ. P. 26(b)(3)&(4)
265	2004/04/12	Oklahoma Water Resources Board	No	Oklahoma Attorney General, Oklahoma Water Resources Board, Oklahoma Conservation Commission, Oklahoma State University, Oklahoma Scenic Rivers Commission, Oklahoma Department of Environmental Quality	e-mail; summary sheet	Oklahoma State Agency Summary Sheet for the meeting concerning the scenic river monitoring protocol development held on 04/09/04	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
266	undated	Oklahoma Attorney General, Oklahoma Water Resources Board	Yes, in part	Oklahoma Attorney General, Oklahoma Water Resources Board	draft Memorandum of Agreement	Different draft versions of Memorandum of Agreement and attachments/supporting documentation for Illinois River Watershed High-Flow and Base-Flow Sampling and Analyses	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
267	2005/04/27	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	E-mail concerning Illinois River Basin Information Request and attachment containing Illinois River Watershed data	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
268	2005/04/27	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	E-mail concerning Illinois River Basin Information Request	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
269	2005/04/27	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	E-mail concerning Illinois River Basin Information Request	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege



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270	2005/04/27	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	E-mail concerning Illinois River Basin Information Request	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
271	2005/04/26	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	E-mail concerning Illinois River Basin Information Request	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
272	2005/04/27	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	E-mail concerning Illinois River Basin Water Quality Data	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
273	2005/04/26	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	E-mail concerning Illinois River Basin Water Quality Data	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
274	2005/04/22	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	E-mail concerning Illinois River Basin Water Quality Data	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
275	2005/04/27	Oklahoma Water Resources Board	No	Oklahoma Water Resources Board	e-mail	E-mail concerning Illinois River Basin Information Request	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
276	various	Counsel for the State of Oklahoma	Yes	consulting experts retained by the State of Oklahoma in anticipation of litigation	correspondence	correspondence relating to sampling in the Illinois River Watershed	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege

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277	various	consulting experts retained by the State of Oklahoma in anticipation of litigation	No	Counsel for the State of Oklahoma	correspondence	correspondence relating to sampling in the Illinois River Watershed	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
278	various	Counsel for the State of Oklahoma	Yes	various state agencies	correspondence	correspondence relating to sampling in the Illinois River Watershed	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege
279	various	various state agencies	No	Counsel for the State of Oklahoma	correspondence	correspondence relating to sampling in the Illinois River Watershed	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege